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12 BRIGIT MARIE BISSELL

13  
14 IN THE UNITED STATES DISTRICT COURT  
15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16  
17 UNITED STATES OF AMERICA,  
18 Plaintiff,  
19 vs.  
20 BRIGIT MARIE BISSELL,  
21 Defendant.

22 Case No. 1:22-cr-00031-DAD-BAM-1  
23 STIPULATION TO REMOVE  
24 CONDITION OF PRETRIAL RELEASE;  
25 ORDER THEREON  
26 JUDGE: Hon. Erica P. Grosjean

27 IT IS HEREBY STIPULATED by and between the parties, through their respective  
28 counsel, Assistant United States Attorney Antonio Jose Pataca, counsel for plaintiff, and  
1 Assistant Federal Defender Erin Snider, counsel for defendant Brigit Marie Bissell, that the  
2 Court may remove the location-monitoring condition of Ms. Bissell's pretrial release (Condition  
3 7(b)). Pretrial Services supports this request.

4 On January 20, 2022, Ms. Bissell appeared before the Honorable Stanley A. Boone for a  
5 detention hearing. ECF #11. The Court ordered Ms. Bissell's release subject to conditions. *Id.*;  
6 *see also* ECF #15. On January 28, 2022, the government filed a motion for bail review. ECF #20.  
7 On February 17, 2022, after much litigation, the Honorable Dale A. Drozd ordered Ms. Bissell to  
8 remain on release but added Condition 7(b), a home-detention condition. ECF #42; ECF #43. On  
9 June 3, 2022, the Honorable Barbara A. McAuliffe signed an order modifying the location-  
10 monitoring condition to curfew rather than home detention. ECF #53.

On September 27, 2022, the parties filed a plea agreement, pursuant to which Ms. Bissell will plead to a violation of 18 U.S.C. §§ 371 and 2232, conspiracy to destroy or remove property to prevent seizure. ECF #77. The offense carries a five-year maximum term of imprisonment. *Id.* The government will dismiss the remaining charges in the indictment and recommend a time-served sentence with two years of supervised release. *Id.* A change-of-plea hearing is scheduled for October 11, 2022, at 8:30 a.m.

In light of Ms. Bissell's compliance and the parties' plea agreement that dramatically changes Ms. Bissell's exposure, the parties jointly request that the Court remove Ms. Bissell's location-monitoring condition. Ms. Bissell's Pretrial Services Officer in the Western District of Washington and Anthony Perez, the Pretrial Services Officer in this District, are supportive of this request.

Accordingly, the parties hereby stipulate that the Court may remove Condition 7(b) of Ms. Bissell's conditions of pretrial release.

Respectfully submitted,

**PHILLIP A. TALBERT**  
United States Attorney

Date: September 30, 2022

*/s/ Antonio Jose Pataca*  

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**ANTONIO JOSE PATACA**  
Assistant United States Attorney  
Attorney for Plaintiff

HEATHER E. WILLIAMS  
Federal Defender

Date: September 30, 2022

*/s/ Erin Snider*  
ERIN SNIDER  
Assistant Federal Defender  
Attorney for Defendant  
BRIGIT MARIE BISSELL

## **ORDER**

Upon the parties' stipulation and for good cause shown, the Court hereby removes Condition 7(b) of defendant Brigit Marie Bissell's pretrial release.

IT IS SO ORDERED.

Dated: **September 30, 2022**

/s/ *Evan P. Gross*  
UNITED STATES MAGISTRATE JUDGE